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**[EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT
CODE § 6103]**

8 Attorneys for Defendants
9 CITY OF PALOS VERDES ESTATES and
10 CHIEF OF POLICE JEFF KEPLEY

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA; WESTERN DIVISION**

12 CORY SPENCER, an individual;
13 DIANA MILENA REED, an
14 individual; and COASTAL
15 PROTECTION RANGERS,
16 INC., a California non-profit
17 public benefit corporation,

16 Plaintiffs,

17 v.

18 LUNADA BAY BOYS; THE
19 INDIVIDUAL MEMBERS OF
20 THE LUNADA BAY BOYS,
21 including but not limited to
22 SANG LEE, BRANT
23 BLAKEMAN, ALAN
24 JOHNSTON aka JALIAN
25 JOHNSTON, MICHAEL RAE
26 PAPAYANS, ANGELO
27 FERRARA, FRANK FERRARA,
28 CHARLIE FERRARA and N.F.;
CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE
JEFF KEPLEY, in his
representative capacity; and
DOES 1-10,

Defendants.

Case No. 2:16-cv-02129-SJO-RAO

Assigned to District Judge:
Hon. S. James Otero; Courtroom: 10C
@ 350 W. First Street, L.A., CA 90012

Assigned Discovery:
Magistrate Judge: Hon. Rozella A. Oliver

**[Exempt From Filing Fees Pursuant To
Government Code § 6103]**

**DECLARATION OF CHRISTOPHER D.
GLOS IN SUPPORT OF CITY OF
PALOS VERDES ESTATES AND CHIEF
OF POLICE JEFF KEPLEY'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR ADMINISTRATIVE
RELIEF PURSUANT TO FED. RULES
OF CIVIL PROCEDURE 56(d)**

[Filed concurrently with Opposition and
Declarations of Howard Liberman and Jacob
Song]

Date: September 5, 2017
Time: 10:00 a.m.
Ctrm.: 10C; Hon. S. JAMES OTERO

Complaint Filed: March 29, 2016
Trial: November 7, 2017

DECLARATION OF CHRISTOPHER D. GLOS

I, Christopher D. Glos, declare as follows:

1. I am a partner with the law firm Kutak Rock, LLP, counsel of record for Defendants City of Palos Verdes Estates (the “City”) and Chief of Police Jeff Kepley (“Kepley”) in the above captioned action. I am a member in good standing of the State Bar of California. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to such facts under oath.

2. The June 13, 2017 and June 23, 2017 meet-and-confer discussions referenced in the Wolff Declaration [Dkt. 398, ¶ 13] were limited to whether City Councilmember’s used their personal electronic devices for City business and, to the extent the devices were used for business purposes, whether the City was obligated to produce that ESI based on Plaintiffs’ overly broad discovery requests.

3. Mayor Jim Vanderver, Councilmembers Jennifer King and Betty Peterson, and former Councilmember John Rea’s cell phones were imaged and searched pursuant to the terms provided by Plaintiffs on May 12, 2017.

4. The City preserved and imaged all 13 cell phones owned by the City and used by the Palos Verdes Estates Police Department. These City-owned cell phones are issued as follows: Captain Tony Best; Officer Celia Williford; Detective Russel Venegas (2 phones); Watch Commander; Patrol 1; Patrol 2; Detective Charles Reed (2 phones); Corporal Greg Robinson; Administrator Linda Williams; Detective Sergeant Luke Hellinga; and Captain Mark Velez.

5. The City preserved and imaged City-owned cell phones used by City administration officials and employees: City Manager Tony Dahlerbruch; Deputy City Manager and Planning and Building Manager Sheri Repp Loadsman; Public Works Director Ken Rukavina; City Clerk Vickie Kroneberger; and Public Works staff members Joe Mendoza, Steve Beard, Alec Abrego, John Strum, and Pete Tepus.

